

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CATHERINE HARRIS

Plaintiff,

v.

GENERAL MOTORS CORPORATION
Defendant.

CIVIL ACTION
NO: 04-10007RWZ

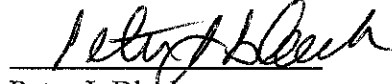
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2004 APR -1 P 2:51
U.S. DISTRICT COURT
DISTRICT OF MASS.

PLAINTIFF'S MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Now comes the Plaintiff, pursuant to Fed. R. Civ. P. 26, and respectfully requests that the Court enter the parties' Stipulated Protective Order, a copy of which is attached hereto as Exhibit A. As grounds for this motion, Plaintiff has requested certain information from the Defendant which the Defendant claims to be of a confidential nature. Accordingly, the parties have agreed to a procedure, as detailed in the Stipulated Protective Order, for identifying those materials which the Defendant contends are confidential, a means of challenging any such designation, procedures for the handling of such materials during this litigation and a procedure for dealing with such material upon the completion of this litigation. Thus the entry of this Stipulated Protective Order will serve to both protect the interests of the Defendant while at the same time provide to the Plaintiff materials in the possession of the Defendant to which the Defendant claims the Court's protection without the likely need of the Court's intervention.

WHEREFORE, the Plaintiff respectfully requests that the Court enter as its order the parties' Stipulated Protective Order.

MEEHAN, BOYLE, BLACK & FITZGERALD, P.C.



Peter J. Black

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CERTIFICATE OF SERVICE

I, Peter J. Black, hereby certify that on March 31, 2004, I gave notice of Plaintiff's Motion for Entry of Stipulated Protective Order by mailing an exact copy thereof, postage prepaid to counsel of record, Melissa Lightcap Cianfrini, Esq., Eckert Seamans Cherin & Mellott, LLC, 600 Grant Street, 44th Floor, Pittsburgh, PA 15219.



Peter J. Black

B.B.O. #044407